

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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**IN RE: ZIMMER NEXGEN KNEE )  
IMPLANT PRODUCTS LIABILITY )      MDL No. 2272  
LITIGATION                  )  
                                )  
                                )      Master Docket Case No. 1:11-cv-05468  
                                )  
                                )**

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**This Document Relates to All Cases**

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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on Friday, December 14, 2012 at 9:30 AM, or as soon thereafter as we may be heard, counsel for Plaintiffs shall appear before the Honorable Rebecca Pallmeyer in Courtroom 2119 of the U.S. District Court for the Northern District of Illinois, Dirksen Building, 219 South Dearborn, Chicago, Illinois and then and there present the following motion: **Plaintiffs' Motion For an Order Establishing a Time and Expense Reporting Protocol and Establishing a Common Benefit Fund**

Dated: November 26, 2012

Respectfully Submitted,

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*Co-Leads for Plaintiffs' Counsel*

**CERTIFICATE OF SERVICE**

I certify that on November 26, 2012, a copy of the foregoing Notice of Motion was filed electronically. Parties may access this filing through the Court's system.

/s/ James R. Ronca